Applicability Changing & Updating

The following have to meet all requirements of this section:

- Premises w/ actuals > 25 or 50 tpy
- Unit w/ actuals > 137 or 274 lbs/day during ozone season
- Boiler w/ MRC > 50 MMBtu/hr
- EGU participating in ISO demand response program

The following have to meet tune-up and record keeping only:

- Premises w/ pte 25 or 50 tpy
- Unit w/ pte > 137 or 274 lbs/day during ozone season
- Boiler w/ MRC 5 to 50 MMBtu/hr

Considering county shift adding to Fairfield/severe:

- New Haven
- Middlesex

Trading Changing Over Time

May 1, 2009

- No more DERC generation or use
- Only CAIR allowances 1:1 and 7:1

January 1, 2012

- Changing ratio of allowances that must be used
- Assessing value derived

OTC Emission Limits More Stringent

Biggest issue we face

- What numbers are absolutely unattainable
- Costing barriers

Tune ups

Assessing value derived from requiring these tune ups Assumptions made

- CEM sources on top of issues
- Those with boiler operator certification on top of issues

Boiler Operator Certification

Who do sources use and respect?

- ASME QFO Boiler Operator Certification
- National Board of Boiler and Pressure Vessel Inspectors